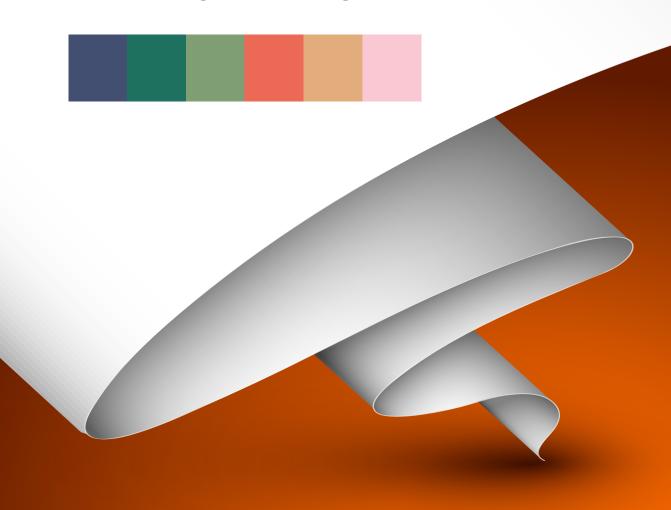
STATES REFLECT ON YEAR ONE IMPLEMENTATION OF ESSA

Planning for Progress





Introduction

The Every Student Succeeds Act (ESSA), enacted in December 2015, shifts many key decisions about federal K-12 education programs from the federal government to the states. Unlike the No Child Left Behind Act (NCLB), its predecessor, ESSA leaves it to states to determine how to measure school progress within certain parameters and charges states and school districts with determining which "evidence-based" approaches to use to improve low-performing schools. To help stakeholders monitor state implementation of federal programs in a decentralized environment, ESSA expands the information about performance and progress that states must make publicly available in annual "report cards."

To give states time to make the transition to the new law, the final deadline for states to submit their plans for implementing ESSA to the U.S. Department of Education (ED) was September 18, 2017. At this critical point, the Center on Education Policy (CEP) sought to learn more about the experiences of state education agencies (SEAs) in the early phases of ESSA implementation. In September and October of 2017, we administered a survey to state deputy superintendents of education or their designees. Officials from 45 states responded to the survey. This report describes the survey findings.

Summary of Emerging Themes and Key Findings

Although many ESSA requirements have just started to take effect, the survey responses suggest some emerging themes about state implementation.

Shifting more control to the states brings greater demands and may strain state capacity.

Although many state survey respondents have positive views about ESSA's devolution of control from the federal government to state and local educators, that comes at a cost:

- Officials in 23 of the 45 responding states said their SEA had a heavier workload under ESSA than under NCLB.
- All but one respondent said their state lacked the capacity to implement one or more ESSA requirements.
- In many cases, this strain on state capacity has been coupled with inadequate federal funds for state administration. Officials in 19 states said their SEA did not have adequate federal funding to administer ESSA, while 13 said they did have enough funds, and 13 more were unsure.

Some states want additional federal guidance.

In 2017, the Congress, Trump Administration, and U.S. Department of Education rolled back Obamaera regulations that gave states and school districts further guidance on ESSA's accountability requirements. Moreover, the current ED has taken a limited approach to producing written materials to clarify ESSA. Although Obama-era regulations and guidance covering some aspects of ESSA are still in place, issues may arise that need further clarification from ED to help states and districts in interpreting the law.

• A majority (25) of responding state officials said the written guidance on ESSA from the current ED is too little or lacking in detail, while 12 said it is about the right amount, and 2 said it is too

- much or too detailed.
- State views are mixed about the helpfulness of the current ED's written guidance.
- Many state officials (35) said their state has reached out to the current ED for assistance in implementing ESSA. Most of those who reached out said that ED officials were responsive; however, some added that the responses they got from ED were not always helpful.

Most states are keeping districts at the forefront in improving low-performing schools.

ESSA puts districts as the first responders in deciding which actions to take to improve low-performing schools, but if those schools fail to improve within a state-determined timetable, then states are required to step in.

- In making these next-step decisions, 31 survey respondents said their states will work collaboratively with districts or let districts take the lead with state approval.
- Only two state officials said that the state alone will decide how to intervene in schools that fail to improve.

Expanded ESSA requirements for reporting and redesigning state report cards do not appear to present major problems, with some exceptions.

Although NCLB also required report cards, ESSA greatly expands the data on state, district, and school performance that must be made publicly available in report cards.

- Generally, the state survey respondents reported very few challenges in producing the information required for report cards.
- However, 34 survey respondents said their states were experiencing at least some difficulty with the requirement to report on federal, state, and local per pupil expenditures.
- In addition, officials in 28 states experienced at least some challenges in providing district-reported civil rights data on school quality, climate, and safety. Districts must already submit these data to the ED's Office of Civil Rights, but states do not always receive the data.

State math, English language arts (ELA), and science assessments are in flux—most states are planning changes in their assessment systems in the next three years.

Many states have adopted new or revised state content standards or have changed their affiliation with a test consortium or test provider, and these actions necessitate changes in the state assessment system.

• In 35 states, officials noted that their state plans to change one or more ESSA-required assessments in the next three years.

Many states are taking steps to cut back on the number of tests or reduce time spent on testing.

NCLB was criticized for fueling an increase in testing. This sometimes led to parents "opting-out" their child from taking state-mandated exams.

• Respondents in 25 states said that their state is taking one or more steps to reduce testing, either by eliminating assessments, reducing the frequency or length of exams, or setting targets for the amount of time students sit for tests.

Engaging key stakeholders in ESSA state planning has made a difference.

In developing their ESSA plan, states had to engage in "timely and meaningful consultation" with stakeholder groups.

- All 45 state survey respondents found stakeholders' engagement in ESSA planning to be helpful.
- All 45 responding states plan to continue consulting with key groups during ESSA implementation.
- Officials in 27 states report that stakeholder groups are mobilizing or will mobilize to monitor state and local implementation of ESSA.

Eliminating funding for ESSA Title II-A programs for teachers and principals would present challenges in most states.

The Trump Administration and the U.S. House of Representatives have called for the elimination of funding for ESSA's Title II, Part A, which supports professional development and other strategies to promote excellence in teaching and school leadership.

- Large majorities of survey respondents noted that without Title II-A funds, their state would find it very challenging to provide professional development to teachers and principals.
- A majority of survey respondents said that without Title II-A dollars, it would be moderately or very challenging for their state to carry out teacher recruitment and retention efforts, programs supporting alternative routes into the teaching profession, class-size reduction activities, and principal and teacher evaluation systems.

States appear to be undecided about or uninterested in participating in a federal private school voucher program funded with ESSA money.

In light of statements by President Trump and Secretary of Education DeVos supporting federal funding of public and private school choice, our survey asked officials whether their state would apply to participate in a program that allowed federal ESSA funds to be used for private school vouchers.

- No state official gave a "yes" response indicating that their state would participate in a federally funded voucher program.
- About half (25) of survey respondents were unsure whether their state would apply for such a program, while 18 said their state would not apply. One choose the "other" response.

Survey findings shed light on how states are approaching other aspects of ESSA implementation.

Here are additional key findings from the survey:

- Greater state control. Most (29) of the responding state officials agree that ESSA has shifted more control of education accountability from the federal to the state level—and 21 of those 29 respondents see this as a positive change.
- State assistance for low-performing schools. All of the survey respondents reported that their states are planning actions to help school districts improve low-performing schools. The

most commonly cited actions include developing templates and supports for local needs assessments, creating a process for state approval of improvement plans for low-performing schools, and providing technical assistance to districts.

- Use of state high school assessments for college decisions. Results from state college and career
 ready high school assessments are rarely used by state higher education systems to make
 admissions or course placement decisions. Officials in just two states reported that their public
 higher education systems are using state high school assessment results for decisions about
 admissions and course placement, while six said their state assessments are used for course
 placement only.
- State flexibility. When asked whether ESSA gives their SEA enough flexibility to design an accountability system addressing their unique context, officials in 22 states said yes, while 10 said no. When asked whether their states have enough flexibility under ESSA to determine which steps to take to improve low-performing schools, however, 41 respondents said yes.

Methodology

CEP administered the survey to state deputy superintendents of education or their designees from September to October of 2017. Participants were given the option of completing the survey online or by filling in a Word document. We received responses from officials in 45 states. Not every state answered every question. When responses required clarification, CEP researchers made multiple attempts to follow up by email or phone. In most, though not all, of these cases, we were to able clarify responses.

Survey responses were analyzed using Excel. We have reported the responses in terms of aggregate numbers of states to maintain the anonymity of participating states and individuals and to encourage frank answers.

The sections that follow present the survey responses by topic. In some cases, survey questions and response items have been shortened for readability. The survey also included open-ended questions to allow respondents to elaborate on their short responses or provide details about their experiences with ESSA implementation. The report includes select quotations from these open-ended responses to give flavor to the data. While the quotations were selected because they reflect similar comments by other respondents or illuminate an issue in an interesting way, the chosen comments are not meant to be representative of all respondents' experiences.

ESSA's Shift of Control

ESSA sought to respond to longstanding complaints that the No Child Left Behind Act was too prescriptive about such issues as how to measure school progress and how to reform low-performing schools. ESSA was billed as a "devolution" of control because it moved key accountability and school improvement decisions from the federal government to state and local education agencies, on the theory that state and local leaders would be better able to design approaches that suited their specific needs and context. Our survey included questions to see whether state education officials agree with this description.

Most (29) of the 45 state officials responding to the survey agreed that ESSA has shifted more control of education accountability from the federal to the state and local levels—and many see this as a positive change.

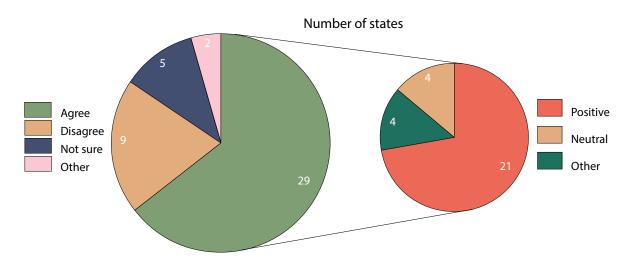
It is interesting, however, that nine survey respondents disagreed that ESSA has shifted control to the state and local levels and five were not sure (see figure 1).

Of the 29 respondents who agreed that ESSA represented a shift of control, 21 viewed this as a positive development for education in their state, and 4 characterized it as neutral. None saw it as a negative action. Four officials chose the "other" response; their explanatory comments indicated mixed opinions about the shift of control, as in these two examples:

Depends on the state—mine will stay true to the civil rights component so this is positive; but I see other states backing away from the responsibility for equity and that is a negative.

In some cases good, in other cases we needed the federal backstop to push further.

Figure 1. Does ESSA represent a shift in control from the federal government to state and local education agencies? If so, is the shift a positive, neutral, or negative development?



Note: No participants selected "negative" (right figure).

Figure reads: SEA officials in 29 states agreed that ESSA represents a shift in control from the federal to the state and local levels (left figure). Of those 29 respondents, 21 viewed this as a positive action (right figure).

Consistent with the shift toward greater state control, more than half (23) of the responding state officials reported that state workloads have increased under ESSA.

ESSA calls on states to take a greater role in complex policy areas, particularly related to accountability and school improvement, which could affect SEA workloads. Officials in 23 states reported that their workloads had increased under ESSA, compared with workloads under NCLB (or under the federal waivers of NCLB that were operative in many states). Another 11 states indicated that their SEA workloads have stayed the same under ESSA, 1 said the state workload had decreased, 4 were not sure, and 6 had other responses.

Number of states

Increased
Stayed the same
Decreased
Not sure
Other

Figure 2. Has the state education agency workload increased under ESSA?

Figure reads: SEA officials in 23 states report that their agency's workload has increased under ESSA compared with that under NCLB or NCLB waivers.

Helpfulness of the U.S. Department of Education Guidance

In March 2017, Congress rescinded regulations put forth by the Obama Administration on the ESSA accountability provisions—part of a broader effort by the Trump Administration and Congressional Republicans to roll back Obama-era regulations and guidance. As of November 2017, the Trump Administration had proposed no new ESSA regulations. Secretary of Education Betsy DeVos also issued an optional template for state ESSA plans that removed some topics included in the Obama Administration's state plan template. Under Secretary DeVos, most of the ESSA information issued by ED has taken the form of "Dear Colleague" letters to chief state school officers. In addition, state education officials have interacted with ED officials about approval of their state ESSA plans.

We wanted to learn what state officials thought of ED's hands-off approach to administering ESSA. Toward this end, the survey included questions about ED written guidance and state officials' interactions with ED officials.

A majority (25) of responding state officials reported that the written ESSA guidance from the current U.S. Department of Education is too little or lacking in detail, while 12 said it is about the right amount.

In contrast, only two state respondents said that ED's written guidance on ESSA was too much or too detailed, while 6 were not sure.

Figure 3. Is the amount of written ESSA guidance from the current U.S. Department of Education adequate?

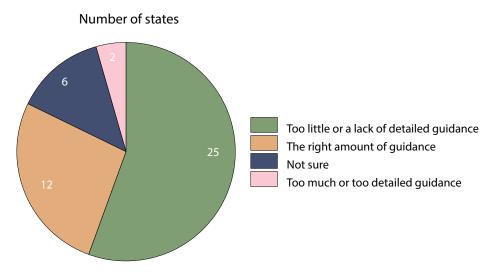


Figure reads: SEA officials in 25 states said the amount of written guidance from the U.S. Department of Education is too little or lacks detail.

State officials have mixed views about the helpfulness of the current ED's guidance: 16 found it helpful, 10 said it was not helpful. and 9 were unsure.

In addition, 10 states selected the "other" response. These states gave a variety of explanations—noting, for example, that the guidance restates the law or is inconsistent or that they would like more guidance in some areas.

Figure 4. Is the written ESSA guidance from the current U.S. Department of Education helpful?

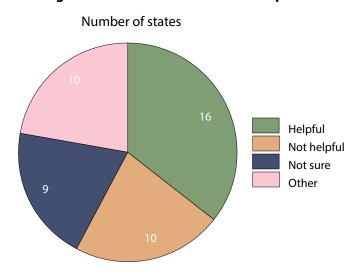


Figure reads: SEA officials in 16 states said the written guidance from the current U.S. Department of Education is helpful.

We asked for elaboration from the state officials who said the current ED's guidance was helpful. Here are some of their comments:

The lack of direct guidance on some things has allowed the states to implement actions, within parameters of Federal law, in ways that make sense in their states.

It is clear and direct. That is helpful. This statement should not be misconstrued to mean it is always something we agree with.

We also asked state officials who did not find the guidance helpful what sort of guidance they would like to see from ED. Examples of their comments follow:

More clear guidance that does not contradict itself and more guidance on what to expect. The lack of regulations hampers what to expect, because in essence, US ED is enacting rules with its policy statements.

Information is not coming out soon enough.

In the absence of accountability guidance, more objectivity in the review of accountability systems would be appreciated. More clarity on state-specific contexts - no SEA system is the same, yet guidance is often one-size-fits-all, or non-existent.

Most (35) of the survey respondents said their state has asked the current U.S. Department of Education for assistance in implementing ESSA. The majority (26) of these state officials found ED to be responsive.

Specifically, officials from 35 of the 45 states responding to the survey reported that their state had sought assistance on ESSA from current ED officials, such as asking for clarifications of ESSA policy or intent. Another 8 respondents said their state had not asked for such assistance, and 2 were unsure.

Figure 5. Has your SEA reached out to the current U.S. Department of Education for assistance in implementing ESSA?

Number of states

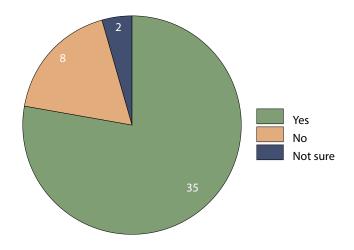


Figure reads: SEA officials in 35 states reported that their state has reached out to the current U.S. Department of Education for assistance in implementing ESSA.

Of the 35 states that had contacted ED, 26 reported that current ED officials were responsive, while 4 said they were not responsive and 5 selected the "other" response.

Some state officials, including those who responded "other," provided additional comments to explain their views. Many of these comments suggested that while current ED officials were responsive, their answers were not always helpful. Some respondents explained that ED officials simply restated the law or guidance, or gave delayed or contradictory information. One state official pointed out that ED had "a lot of empty seats." The quotes below are representative of these comments:

Not able to answer questions or delayed response

Staff at ED were responsive, but not particularly informative. Responses were typically limited to references to existing guidance. This made it hard to translate the response to apply to our state's context-specific questions

Always respond quickly, but don't always agree with their interpretation of the statute

State Education Agency Capacity to Implement ESSA

Often, when policymakers talk about devolving control over education to states, they do not take into account the capacity of state education agencies to take on these new roles. CEP has been studying state capacity since the early days of NCLB,¹ and our research has shown that SEAs often lack the capacity needed to implement federal K-12 education programs.

To shed light on state capacity to implement ESSA, we asked SEA officials about three types of capacity—sufficient funding, expertise, and staffing levels. We first asked officials whether their SEA had *all three* types of capacity necessary to carry out various duties under ESSA. Respondents who said "no" to that question were then asked separate questions about each type of capacity.

The survey questions looked at state capacity to carry out particular ESSA responsibilities, including implementing school improvement activities, measuring and reporting on accountability indicators, producing state report cards, and other areas. In general, all but one of the responding states reported a lack of funding, expertise, and/or staffing capacity for some of these areas of responsibility.

Only about one-third or fewer (8–14) state respondents said their SEA has sufficient capacity to implement various school improvement requirements under ESSA.

Most of the responding state officials said their SEA lacks one or more type of capacity—funding, expertise, or staffing—to fulfill various state responsibilities for school improvement.

¹ See Center on Education Policy, 2003; 2004; 2005; 2007a; 2007b; 2011; and 2013.

Table 1. Does your state educational agency have sufficient capacity to carry out ESSA school improvement requirements?

School reform responsibility	SEA has sufficient funding, expertise, and staffing to carry out this requirement	SEA needs more funding	SEA needs more expertise	SEA needs more staffing levels
Monitor implementation of plans in comprehensive support and improvement (CSI schools)*	9	25	14	32
Provide technical assistance to school districts with significant numbers of CSI or targeted support and improvement (TSI) schools*	8	29	15	34
Determine if interventions for CSI schools meet ESSA's evidence requirements	13	16	22	19
Determine interventions for CSI schools that fail to exit that status	14	20	22	25
Periodically review resource allocations to support school improvement in districts with significant numbers of CSI or TSI schools	14	19	16	24
Support continuous improvement of schools	8	29	13	34

^{*}Comprehensive support and improvement (CSI) schools include the lowest-performing 5% of Title I schools in the state and high schools that graduate one-third or fewer of their students; targeted support and improvement (TSI) schools are public schools with one or more consistently under-performing subgroups of students.

Table reads: SEA officials in nine states said their state has sufficient funding, expertise, and staffing to carry out the ESSA requirement to monitor implementation plans in comprehensive support and improvement schools. Of the remaining survey respondents, 25 reported that their state needs more funding to meet this requirement, 14 need more expertise, and 32 need more staffing.

A majority (25–34) of state respondents said their SEA has sufficient capacity to measure and report on ESSA's accountability indicators.

Between 25 and 34 of survey respondents indicated their SEA has sufficient funding, expertise, and staffing to carry out various state responsibilities related to accountability indicators. Between 6 and 14 states reported lacking at least one type of capacity.

Table 2. Does your state educational agency have sufficient capacity to measure and report on ESSA's accountability indicators?

State capacity to measure and report on—	Has sufficient funding, expertise, and staffing to carry out this responsibility	SEA needs more funding	SEA needs more expertise	SEA needs more staffing levels
Academic progress indicator	34	6	8	9
School quality/student performance indicators of success	25	11	14	14
Language proficiency of English learners	28	9	10	14
English learners' progress toward language proficiency	29	7	9	13

Table reads: SEA officials in 34 states said their state has sufficient funding, expertise, and staffing to carry out the ESSA requirement to measure and report on their chosen indicator of academic progress. Of the remaining survey respondents, six reported that their state needs more funding to meet this requirement, eight need more expertise, and nine need more staffing.

States vary in their capacity to fulfill other ESSA requirements.

To meet ESSA's state report card requirements, officials in 21 states reported having sufficient capacity while 21 said they need more funding, and several states need more expertise and/or staffing. To implement ESSA's data collection requirements, 18 states said they have sufficient capacity, but many other states reported capacity needs. To ensure an equitable distribution of qualified teachers, 15 states have sufficient capacity, but more states reported a lack of capacity in terms of funding (22 states), expertise (20), and staffing (21).

In addition, ESSA allows, but does not require, states to develop a list of evidence-based, state-determined school improvement strategies that can be implemented in CSI schools. Officials in 12 states said their state will not be developing these lists. Of the remaining states, 9 indicated that they have sufficient capacity to carry out this activity. Sixteen states need more funding and more expertise to develop the list, and 19 need more staff.

Table 3. Does your state educational agency have sufficient capacity to carry out other ESSA requirements?

ESSA requirement	SEA has sufficient funding, expertise, and staffing to carry out this responsibility	SEA needs more funding	SEA needs more expertise	SEA needs more staffing levels
Meet ESSA's requirements to develop, publish, and disseminate the state report card	21	21	11	13
Collect required data under ESSA	18	19	7	19
Ensure equitable distribution of qualified teachers	15	22	20	21
Establish a list of evidence-based state-determined strategies that can be implemented by LEAs in CSI schools*	9	16	16	19

^{*}This is an optional activity under ESSA. Twelve states indicated that they were not going to take this option.

Table reads: SEA officials in 21 states said their state has sufficient funding, expertise, and staffing to meet the ESSA requirement to develop, publish, and disseminate the state report card. Of the remaining survey respondents, 21 reported that their state needs more funding to meet this requirement, 11 need more expertise, and 13 need more staffing.

State Implementation Challenges

In addition to asking state officials about state capacity to implement specific ESSA duties, the survey included a general question about any challenges states foresee in implementing the new law.

More than half (24) of the state survey respondents anticipate challenges in implementing one or more aspects of ESSA.

Among the remainder of the survey respondents, 7 anticipated no such implementation challenges, 11 were not sure, and 3 gave other responses.

Figure 6. Do you anticipate any aspects of ESSA will prove challenging to implement?

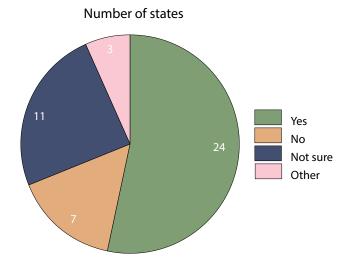


Figure reads: SEA officials in 24 states expect aspects of ESSA to be challenging to implement.

We asked state officials which specific provisions of ESSA they expect to pose challenges. Here are some of their responses:

SEAs were not set up to provide as much support and monitoring as ESSA (and NCLB) necessitate

Accurate financial transparency reporting at the school building level for large school districts

English language proficiency goals

Our state statute allows parents to opt their students out of testing. We will not meet the 95% participation requirement.

Adequate Levels of Administrative Funding

ESSA allows SEAs to reserve a percentage of funds to support state efforts to administer each of the law's federal programs. For example, states may reserve 1% of their Title I allocation or \$400,000, whichever is greater, to administer Title I. In addition to asking about states' funding, expertise, and staffing capacity to meet specific ESSA requirements, the survey also asked whether states have sufficient federal funding from these percentage set-asides to carry out their newly expanded administrative and programmatic duties under ESSA.

State officials are divided about whether their SEAs have enough federal funds to administer ESSA programs.

Officials in 13 states said yes, they have enough federal administrative funds; 19 said no; and 13 were unsure.

Number of states

13

Shortfall will not be made up

State will provide additional funds to SEA

Yes

Not sure

Not sure

Figure 7. Does your SEA have sufficient federal funding to carry out ESSA's administrative and programmatic duties? If not, how will your SEA make up the shortfall?

Figure reads: SEA officials in 19 states said their agencies do not have sufficient federal funding to carry out ESSA's administrative and programmatic requirements (left figure). Twelve states indicated that the funding shortfall will not be made up (right figure).

Not sure

Among the 19 officials that reported their SEA did not have sufficient federal funding, 12 said the shortfall of funding will not be made up. Four were unsure, two said their state will seek funding from other sources, and one indicated that the state will make up the difference.

Use of External Providers

One way that states with limited SEA capacity can support ESSA implementation is by using external providers.

Most state respondents (37) reported outsourcing at least one ESSA-related state responsibility to external providers.

Of the 37 states that are using external providers, the most frequently mentioned outsourced activities include developing state, district, and school report cards (20 states); developing assessments aligned to state standards (19); providing professional development to principals (17) and teachers (15); and providing technical assistance (15). States are also getting outside entities to help with measuring English language proficiency (13), developing data that can be cross-tabulated (11), and other activities shown in the table below. Seven states are outsourcing activities other than those listed in the table.

Only 8 respondents said their state was not outsourcing any ESSA responsibilities.

Table 4. Which ESSA responsibilities are being carried out by external providers in your state?

	Number of states
Developing state, district, and school report cards	20
Developing assessments aligned to state standards	19
Principal professional development	17
Teacher professional development	15
Technical assistance	15
Measuring English language proficiency	13
Developing easily accessible and user-friendly student data that can be cross-tabulated	11
Determining interventions for CSI schools that fail to exit that status	6
Analyzing school indicators to be included in the state's accountability system to determine which schools are CSI or TSI schools	6
Another responsibility	7

Note: Eight SEA officals said they were not outsourcing any responsibilities under ESSA.

Table reads: SEA officials in 20 states reported that their agency is using external providers to develop state, district, and school report cards.

State Accountability Systems

At the heart of ESSA are its procedures for holding districts and schools accountable for effectively educating all students. While ESSA continues NCLB's basic concept of testing and tracking the performance of key subgroups of students, states and school districts have more flexibility about how to accomplish this than under the previous law. The key accountability provisions of ESSA, which are explained in more detail in the Appendix, include the following:

- States must develop accountability systems that include indicators of academic achievement, English language proficiency, and school quality, as well as graduation rates for high schools, and may include other indicators.
- These indicators must measure the performance of all students and key student subgroups² and "meaningfully differentiate" school performance in order to identify low-performing schools.
- States must identify three types of low-performing schools for extra support and interventions:
 - Comprehensive support and improvement (CSI) schools, which include the lowest-

² Students from major racial and ethnic groups, economically disadvantaged students, children with disabilities, and English learners.

- performing 5% of Title I schools in the state and all public high schools that fail to graduate one-third or more of their students;
- Targeted support and improvement (TSI) schools, which are public schools with one or more consistently under-performing student subgroups; and
- Additional targeted support schools, or public schools in which any one subgroup is performing at the level of the lowest 5% of Title I schools.
- States must notify districts about which schools have been identified as CSI or TSI schools and must develop criteria and a timetable for determining when CSI and TSI schools have improved enough to exit this status.

Fewer than half (22) of the survey respondents agreed that ESSA gives their state sufficient flexibility to design accountability systems that address their unique contexts.

By contrast, 10 survey respondents said their states did not have sufficient flexibility to tailor accountability to their contexts. Nine respondents were unsure, and four gave other responses.

Figure 8. Does ESSA provide sufficient flexibility to design an accountability system that addresses your state's unique context?

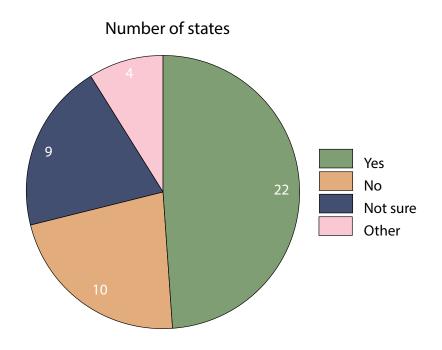


Figure reads: SEA officials in 22 states said that the ESSA provides their agency with enough flexibility to design an accountability system that addresses their state's unique context.

State Assistance to Districts to Improve Low-performing Schools

Under ESSA, school districts, in partnership with stakeholders, are responsible for developing and implementing plans, including evidence-based interventions, to improve student outcomes in each of their CSI and TSI schools. Although decisions about how to improve CSI schools are made at the local level, states are still expected to provide support and assistance.

A large majority (41) of survey respondents said that ESSA gives them enough flexibility to determine which steps to take to improve low-performing schools.

No respondent said their state didn't have enough flexibility. Respondents in four states were unsure.

Figure 9. Does ESSA provide sufficient flexibility to determine interventions for low-performing schools?

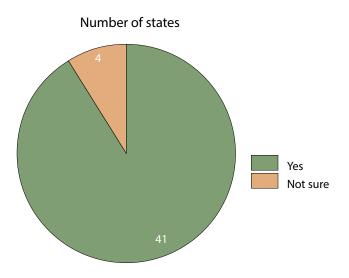


Figure reads: State officials in 41 states reported that ESSA gives them enough flexibility to determine steps to improve low-performing schools.

All 45 responding states are planning some type of action to help school districts improve persistently low-performing schools—for example, by developing templates for needs assessments, creating a state approval process for school improvement plans, or providing technical assistance to districts.

As shown in the table below, survey respondents said their states, in addition to distributing federal funds for school improvement, are planning a variety of actions to support district efforts to improve low-performing schools.

Table 5. How does your state plan to support district efforts to improve low-performing schools?

State-provided activity	Number of states planning action
Templates or supports for conducting needs assessments for school improvement plans or reviews of resource equity	41
A process for SEA approval of CSI and TSI plans with clarity on required elements of turnaround plans	40
Direct technical assistance to districts with significant numbers of CSI and/or TSI schools	38
Templates for improvement plans	31
A list of interventions that meet ESSA's evidence standards and may be used in CSI or TSI schools	26
Technical assistance through state regional education service providers	21
State funding targeted to districts with significant numbers of CSI and/or TSI schools	21
Technical assistance through a third-party provider to districts with significant numbers of CSI or TSI schools	17
Other	7

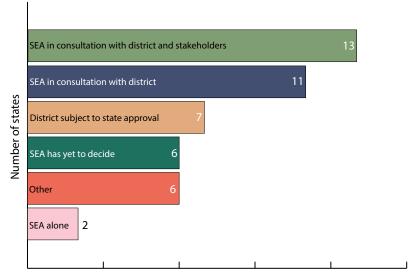
Table reads: SEA officials in 41 states said that their state plans to provide templates or supports for conducting needs assessments as part of its efforts to support districts in improving persistently low-performing schools.

If a CSI school does not improve enough to meet the state's criteria and timetable for exiting its status as a persistently low-performing school, then the state must determine more rigorous actions to help that school.

To determine next steps when low-performing schools fail to improve, most states (31) are planning to work with district leaders rather than act alone.

Most survey respondents reported that their SEA planned to collaborate in some way with school districts to determine rigorous actions for CSI schools that fail to improve within a specific period—13 states by consulting with district leaders and stakeholders, 11 by consulting with districts, and 7 by allowing districts to determine actions with state approval. Only two officials said their SEA alone will determine interventions for CSI schools. Six states were undecided and six gave other responses.





Note: No participants said they would consult stakeholders only.

Figure reads: SEA officials in 13 states reported that their agency will consult with school districts and stakeholders to determine interventions for comprehensive support and improvement schools that have failed improve.

Evidence-based interventions

ESSA requires state and districts to use school interventions and improvement strategies that are "evidence-based." For low-performing schools (CSI or TSI schools) or for schools applying for school improvement grants, ESSA defines an evidence-based intervention, strategy, or activity as one that "demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on—

- I. Strong evidence from at least 1 well-designed and well-implemented experimental study;
- II. Moderate evidence from at least 1 well-designed and well-implemented quasiexperimental study; or
- III. Promising evidence from at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias"

Most state respondents said their SEA personnel who support school improvement efforts have a moderate (22 states) or strong (18) understanding of ESSA requirements to use evidence-based interventions.

Just three respondents said their staffs have a weak understanding of these requirements, although all three reported that efforts are underway to improve SEA staff's knowledge in this area.

Figure 11. How well do SEA staff who support school improvement understand ESSA's evidence-based intervention requirements?

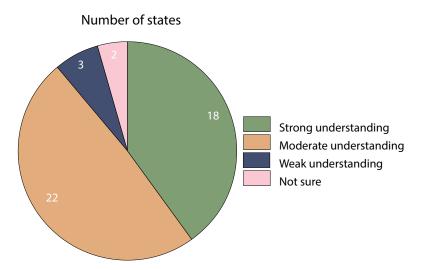


Figure reads: SEA officials in 18 states said that their agency staff who support school improvement have a strong understanding of ESSA's requirements for evidence-based interventions.

A few SEA officials made additional comments on the survey about assisting low-performing schools and using evidence-based strategies:

Some of the strongest feedback that we heard from stakeholders was the importance of consistency. Our state will leverage what is currently working well and building best practices to disseminate across the state. The SEA has the final say on all school improvement efforts, but will work closely with districts in supporting their autonomy and decision-making authority.

The evidence-based provisions are important, but will be challenging to get parties to understand the requirements...

The interpretation of evidence-based will be a key to implementation and to state flexibility.

We are in the process of engaging stakeholders as we develop the specifics of the Needs Assessment, the template for the School Improvement Plan and the list of evidence-based strategies.

ESSA Report Cards and Data Requirements

Along with shrinking federal involvement in state and local decisions, ESSA greatly expands the information that states must make publicly available in annual report cards, beyond what was required by NCLB. The intent is to provide greater transparency and more information to stakeholders, which they could use to monitor state, district, and school efforts to improve student outcomes.

By December 31, 2018, using data from school year 2017-18, states must issue annual report cards that explain the state's accountability system in some detail and include a host of statewide data on student achievement and performance, school quality and climate, teacher qualifications, and more. (See the Appendix for a list of specific elements to be included.) In addition, districts must disseminate annual report cards with information on the district as a whole and each of its schools. States must ensure that each district collects the same information required for the state report card and disaggregates it in the same manner.

Most survey respondents do not find ESSA's expanded state report card requirements to be very challenging, with a few exceptions.

As discussed below, only three of the elements required for the state report cards are presenting difficulties to a substantial number of states—per pupil expenditure data, district civil rights data, and subgroup data for the student success/school quality indicator. For the remaining report card elements, the number of respondents reporting no challenges ranged from 21 to 42, and the number experiencing "some" challenges ranged from 3 to 21.

One of the three most challenging requirements for states is to report on federal, state, and local per pupil expenditures. Respondents in 14 states said this is proving to be "very" challenging, while 20 states are experiencing some challenges. In June 2017, the U.S. Department of Education sent a letter to chief state school officers letting them know they would have one more year to fulfill this report card requirement and that ED would provide assistance to states through the State Support Network.

A second common challenge is the inclusion in state report cards of an array of data that districts are required to report to the U.S. Department of Education under its Civil Rights Data Collection initiative. Officials in 5 states said this requirement was very challenging, and 23 more said it presented some challenges. These data deal with school quality, climate, and safety (suspensions, expulsions, arrests, chronic absenteeism); preschool programs; and accelerated high school coursework to earn postsecondary credit. Districts often submit this information directly to ED, but states do not automatically collect it. And when states do collect these data, they may not be in the final form used by ED.

In January 2017, the Obama Administration issued non-regulatory guidance on ESSA report cards, which indicated that ED would provide to states the district-reported civil rights information to include in state report cards, so the information would be consistent in the federal and state databases. However, it is unclear whether the current administration will provide this data to the states. This uncertainty may be creating challenges for state officials as they try to figure out a mechanism to gather this data from districts, if they were not doing so already.

A third common challenge is the inclusion of data disaggregated by student subgroup for the state's indicator of school quality/student success. Officials in 3 states said this was very challenging, and 20 officials reported some challenges. Since this is a new indicator, states may be having difficulty developing a way to measure school quality/student success that is consistent across all districts and includes all student subgroups.

Table 6. To what extent is your state experiencing challenges in meeting ESSA report card requirements?

	Experiencing no challenges	Experiencing some challenges	Meeting the requirement is very challenging	Not sure
Description of the state's accountability system	22	20	1	2
Academic measures				
Student math, ELA, and science assessment data disaggregated by subgroups*	26	19	0	0
Disaggregated student subgroup data on the other academic indicator	24	19	1	1
Disaggregated student subgroup data on high school graduation rates	35	9	1	0
Information on English learners attaining English proficiency	27	17	1	0
Disaggregated student subgroup data on the state's indicators of school quality/student success	20	20	3	2
Progress of all students and student subgroups toward meeting the state's long-term goals	30	13	1	1
The cohort rate, in the aggregate and disaggregated by subgroups, of high school graduates who enroll in postsecondary programs	21	20	1	3
State 4th and 8th grade NAEP result in math and reading	42	3	0	0
The percentages of students assessed and not assessed, by all students and student subgroups	33	10	0	2
The number and percentage of students with the most significant cognitive disabilities taking alternative assessments	32	13	0	0
Other measures				
Civil rights information on school quality, climate and safety; enrollments in preschool programs; and enrollments in accelerated high school course work	10	23	5	7
Professional qualifications of teachers disaggregated by high-poverty and low-poverty schools	22	21	1	1
Per-pupil expenditures of federal, state, and local funds, including actual personnel expenditures and actual non-personnel expenditures	9	20	14	2

*Must include data disaggregated by major racial/ethnic student subgroups, gender, English language proficiency, students with disabilities, homeless students, students in foster care, and students with a parent on active duty in the Armed Forces.

Table reads: SEA officials in 22 states reported that their agency is experiencing no challenges in describing the state accountability system in their state report card; 20 reported some challenges with this requirement; 1 found it very challenging; and 2 were not sure.

In addition to the items listed in the preceding table, 29 survey respondents said their state will include other information on the state report card that is not required by ESSA, such as:

- School climate survey data
- School discipline data
- Student subgroup data for subgroups beyond those required by ESSA
- Transparency measures that provide a more robust explanation of how schools are performing
- State accreditation information

A majority (37) of responding states are modifying state report cards to make them more accessible to parents and others.

Thirty-three of the 37 states that are modifying report cards to improve accessibility are changing the format, and the same number of states reported modifying the content. Some states (24) are also conducting outreach on the report cards.

Table 7. What steps has your state taken to make report cards more accessible to parents, families, and other audiences?

	Number of states
Modified the report card's format	33
Modified the report card's content	33
Conducted outreach to parents and families of school-aged children	24
Provided report cards in multiple formats, including electronic	21
Provided professional development to principals about the report card so they can help parents, families, and other audiences	13
Provided professional development to teachers about the report card so they can help parents, families, and other audiences	12
Other	12

Table reads: Of the 37 state officials who indicated their state has taken steps to make report cards more accessible to parents, families, and other audiences, 33 said their agency has modified the format of the state report card.

Most state survey respondents (36) do not anticipate problems in providing achievement data that can be cross-tabulated by student subgroups. In this database, many states are including subgroups beyond those required by ESSA.

ESSA requires states to provide student achievement data that, at a minimum, can be cross-tabulated by each major racial and ethnic group, gender, English proficiency status, and disability status. This requirement is intended to produce a more finely grained picture of student subgroup performance for educators and other stakeholders. For example, cross-tabulation makes it possible to analyze achievement data at the school, district, or state level by two factors, such as students who are both Latina and low-income.

Survey respondents in 36 states did not expect problems with this cross-tabulation requirement, while 4 anticipated some difficulty, and 5 were not sure.

Many states (32) are making it possible to cross-tabulate data for additional subgroups, such as students who are eligible for free- and reduced-price school lunch (24), are migrants (23), or are homeless (26); 20 respondents said their state would include all three of these additional subgroups. Other participants, in open-ended comments, reported including gifted and talented students, children with parents in the military, children in foster care, or those with an incarcerated parent.

ESSA Assessments

ESSA continues the federal requirements for states to administer assessments aligned to state content standards in math and English language arts in grades 3-8 and once in grades 9-12. States must also assess student knowledge in science at least once in grades 3-5, 6-9, and 10-12. The tests may be administered as a single summative assessment or through multiple statewide interim assessments during the academic year and result in a single summative score. The assessment results must be disaggregated by subgroups of students, including major racial and ethnic groups, economically disadvantaged students, disability status, English language proficiency status, gender, and migrant status. States must test 95% of all students and 95% of students in each subgroup. Other ESSA testing requirements are described in the Appendix.

Many states (35) expect to make changes to their state math, ELA, and/or science assessment systems in the next three years—often to reflect changes in state content standards or in the state's affiliation with a test consortium or test provider.

State assessments have changed considerably in recent years as states have adopted more challenging math and ELA standards, implemented computer-based assessments, or joined a testing consortium that would enable them to compare their results with those of other states. Some ESSA provisions present additional opportunities for states to change aspects of their assessment systems.

In response to a series of survey questions about assessment changes in the next three years, officials in 35 states reported plans to change assessments in at least one of the three tested subjects—most often science. A majority (27) of the states responding to the survey are updating the content of their science assessments to reflect their state's new or substantially revised science standards. Fewer states reported making changes in math (11 states) or ELA (11) assessments to reflect new or revised standards. Of those states altering their assessment system because of changes to their state standards, 10 are currently making changes all three subjects, or plan to in the next three years.

Few states plan to take advantage of the ESSA option to use a series of assessments during the school year to measure student knowledge instead of one summative assessment at the end of the school year. Only three respondents said their states will use this option for math and ELA, and an additional state plans to use this option in science only.

Several states are changing their affiliation with a testing consortium or testing provider: 11 are doing so for both math and ELA exams and 12 are doing so for their science assessments.

Table 8. What changes is your state planning to make to its assessment system in the next three years?

		Math		Math		ELA		ELA		Science		9
	Yes	No	Not sure	Yes	No	Not sure	Yes	No	Not sure			
Change the content of the existing state assessments because the state substantially revised its standards or adopted new state standards	11	28	6	11	28	6	27	12	6			
Switch to administering multiple state assessments throughout the school year instead of one summative assessment	3	34	8	3	34	8	4	33	8			
Make other changes in the format of the existing state assessments	11	28	6	11	28	6	12	23	10			
Reduce the length of time that students sit for the state assessments	15	18	12	17	17	11	11	17	16			
Change the state's affiliation with a testing consortium or a testing provider	11	23	11	11	22	12	12	21	11			

Note: Not all rows sum to 45 because some states skipped response items.

Table reads: SEA officials in 11 states report that in the next three years their state plans to change the content of its math assessment because the state has substantially revised it math standards or adopted new state standards; 28 states are not making this change, and 6 officials are not sure.

Some states further explained their responses about assessments in the open-ended portion of the survey:

NGSS science assessment [is] being developed in accordance with recent adoption of NGSS standards.

The state has been through a recent transition to revised standards and a new testing vendor. All high school assessments will be online in 2017-18 and we will transition to 5-8 online in the following years. Last year, there were additional changes to format and amount of time for certain subjects. We do not anticipate additional changes, outside of the regular standards review cycle

that could result in additional shifts.

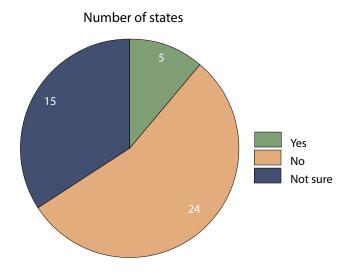
We have PARCC assessments and will be staying with them.

Some states are changing assessments to reduce the length of time students sit for state tests, but relatively few states are setting targets on the total amount of testing time.

Recognizing the desire of many educators and parents to reduce the amount of time spent on testing, ESSA explicitly mentions that states may set targets by grade spans for the aggregate amount of time devoted to administering assessments.

As table 8 shows, several state officials said their states are changing tests to reduce student testing time (15 states in math, 17 in ELA, and 11 in science). However, only 5 survey respondents said their state plans to establish targets for aggregate testing time; 24 said their state will not do this, and 15 were unsure.

Figure 12. Will your state set targets for aggregate time for administering assessments?



Note: One state skipped this question.

Figure reads: SEA officials in five states indicated that their state will establish targets for the aggregate amount of time devoted to administering state assessments.

The survey also asked if states intend to reduce the frequency or length of testing time for state assessments *other than* math and ELA tests. Officials in 28 states said they were not planning on taking these actions to reduce student testing. Seven states reported they will reduce the frequency, nine will reduce the length, and four states plan to eliminate some mandated state exams.

Table 9. How many states are planning to reduce the frequency or length or eliminate statemandated exams other than math and ELA exams?

	Number of states
Reduce the frequency of any state-mandated tests, such as end-of-course exams and/or assessments in subjects other than math and ELA	7
Reduce the length of time that students sit for any state-mandated tests, such as end-of-course exams and/or assessments in subjects other than math and ELA	9
Eliminate any state-mandated tests, such as end-of-course exams and/or assessments in subjects other than math and ELA	4
Are not planning steps to reduce testing	28

Table reads: Of the 17 respondents who said that their SEA was taking actions to reduce testing time for state-mandated tests other than those used for ESSA accountability, 7 said their agency plans to reduce the frequency of these tests.

When we analyzed responses to all of the survey questions about planned reductions in testing, we found that 25 states plan to take one or more steps to reduce testing, either by eliminating assessments, reducing the frequency or length of exams, or setting targets for the amount of time students sit for tests.

Other Testing Issues

Less than half (19) of the responding states plan to develop criteria for allowing school districts to use a high school assessment like the ACT of SAT, instead of state assessments, to meet ESSA high school testing requirements.

ESSA gives districts the option of using a nationally recognized high school assessment, such as the ACT or SAT, to meet the high school testing requirements. The locally selected assessment must be aligned to state academic content standards.

In order for districts to use this option, SEAs must establish technical criteria for approving the local assessments. Eight states are planning to develop these criteria, according to survey respondents, and six more will do so if school districts indicate they would like to pursue this option. Officials in 19 states report that they will not allow school districts to use a nationally recognized assessment, while 11 are not sure.

Table 10. Will your state establish technical criteria for school districts to use a nationally recognized high school assessment?

	Number of states
Yes, the SEA will establish such technical criteria	8
Yes, the SEA will establish such technical criteria if an LEA indicates that it would like to use a nationally recognized assessment	6
No, the SEA will not allow LEAs to use a nationally recognized assessment	19
Not sure	11

Note: One state skipped this question.

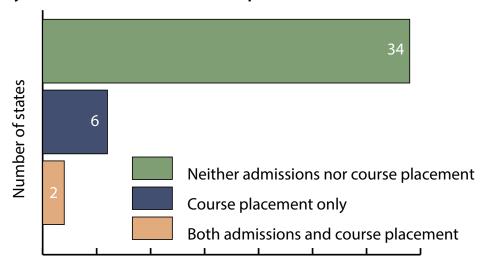
Table reads: SEA officials in eight states said their agency will establish technical criteria for school districts to use a nationally recognized high school assessment.

Only two responding states report that results from state math and ELA exams are being used for college admission decisions.

In the interest of ensuring that students who graduate from high school are prepared for college and careers, ESSA requires states to have challenging academic standards that are aligned with entrance requirements for the state's public higher education system and with relevant state career and technical education standards. If these standards are truly aligned with postsecondary admissions requirements, then results on the state assessments measuring student mastery of the standards could conceivably be used by institutions of higher education to make decisions about admissions, or at least for course placement. The survey asked SEA officials whether this is occurring to their knowledge.

Survey respondents in 34 states indicated that the assessments developed by their state or by a state testing consortium assessment (such as Smarter Balanced or PARCC) were **not** being used for higher education admissions or course placement. Just two states said their state assessments were being used for both these decisions, while six indicated that results on state tests were being used for course placement only.

Figure 13. Are state-developed or consortium assessments being used by the state's higher education system for admissions and/or course placement?



Note: Three states skipped this question. No participants selected the "Admissions only" response.

Table reads: SEA officials in six states said their state-developed or consortium assessment will be used by their state's public higher education system for course placement.

State Plan Development and Stakeholder Engagement

States must develop a plan outlining how they will fulfill ESSA's major requirements. In developing their plan, SEAs must engage in "timely and meaningful consultation" with stakeholder groups, including the governor, state legislators, state board of education, school districts, Indian tribes, principals and other school leaders, other educators and school staff, parents, and charter school leaders. The U.S. Secretary of Education, through a peer-review process, reviews each state plan and approves it or asks for revisions.

All 45 state survey respondents indicated that engaging stakeholders in ESSA planning has been helpful.

All 45 responding officials said that engaging stakeholders in the state planning process helped to make stakeholders aware of ESSA requirements, and 43 said it resulted in more stakeholder support for the plan. Survey respondents noted other helpful aspects of this stakeholder engagement process, as shown in the table below.

Table 11. Which aspects of ESSA stakeholder engagement did states find helpful?

	Number of states
Stakeholders were made aware of the ESSA requirements	45
The process resulted in more stakeholder support for the state plan	43
Stakeholders identified issues outside the scope of the state plan/ESSA	37
Stakeholders generated ideas that the SEA had not considered	35
Other	3

Table reads: SEA officials in 45 states said that making stakeholders aware of ESSA requirements was a helpful outcome of engaging stakeholders in state planning.

Some state officials commented further on the stakeholder engagement process:

(It) created relationships that we can continue to build on for future work.

We developed stronger relationships with stakeholder groups that had not previously been engaged directly in the work of the SEA, which will have a positive long-term impact on our future work.

The most useful input we used came from early childhood providers, advocates, and funders. We learned a great deal and added three strategies to increase integration between early childhood and K-12 systems.

We worked tirelessly to engage stakeholders and to listen...In all, we are very pleased with our stakeholder engagement.

All 45 of the responding states plan to continue consulting with key stakeholder groups during ESSA implementation.

All of the survey respondents said their state would use at least one of the following techniques to obtain stakeholder input as they implement their ESSA plan: continuing state policies to regularly consult with stakeholders (38), informally consulting with stakeholders (36), and formally convening stakeholders (27).

Table 12. How does your state plan to continue engaging stakeholders in modifications of the state ESSA plan?

	Number of states
The SEA regularly consults with stakeholders and will use this established process to seek stakeholder feedback on any changes to the approved ESSA plan	38
The SEA will informally consult with stakeholders via a listserv and/or other informal means to review proposed modifications to the state ESSA plan	36
The SEA will continue to formally convene a panel, consisting of representatives of the same stakeholder groups that consulted with the SEA on its initial ESSA plan, to review proposed modifications to the approved state ESSA plan	27
The SEA currently does not have a system in place for maintaining stakeholder engagement, but plans to have one soon	1
Other	4

Note: No participant selected the "The SEA currently does not have a system in place for maintaining stakeholder engagement, but plans to have one soon" response.

Table reads: SEA officials in 38 states indicated that their agency regularly consults with stakeholders and will use this established process to seek stakeholder feedback on any changes to the approved ESSA plan.

Some respondents gave additional comments about their state's stakeholder engagement activities:

We are convening topic-specific workgroups to look at targeted aspects of the plan, and may do the same in the future, as the need arises.

The state is convening a larger strategic planning process that includes, but is larger than, ESSA.

We conducted a "return tour" after we submitted our ESSA plan and went back to the communities we visited in the first round of stakeholder engagement to explain changes to the plan from the first submission.

A majority (27) of survey respondents reported that stakeholder groups are or will be mobilized to monitor state and local implementation of ESSA.

A key assumption of ESSA is that stakeholders will hold education leaders accountable for improving low-performing schools. To that end, the survey asked state officials if they are aware of efforts by stakeholder groups to monitor state and local implementation of ESSA. Officials in 27 states reported that they were aware of these types of stakeholder efforts in their state. Only one respondent indicated that that stakeholders are not mobilizing to monitor implementation and were not expected to do so.

Table 13. Are you aware of efforts among stakeholder groups to actively monitor state and local implementation of ESSA?

	Number of states
Yes, stakeholders are or will be mobilized to monitor ESSA implementation at the state and local level	27
No, I have not seen any indications of stakeholders doing this, nor do I anticipate any	1
No, I have not seen any indications that stakeholders will do this, but ESSA implementation won't begin until school year 2017-18	4
Not sure	9
Other	4

Table reads: SEA officials in 27 states reported that they are aware of efforts among stakeholder groups to monitor state and local implementation of ESSA.

The 27 respondents who reported that stakeholders were mobilizing or planned to do so were asked which groups were involved. The majority of these respondents mentioned civil rights organizations (23 states), teachers' unions (23), and parents (15), as shown in the table below.

Table 14. Which stakeholder groups are mobilizing to monitor ESSA implementation?

	Number of states
Civil rights organizations	23
Teachers' unions	23
Parents	15
Business leaders	12
Other	9

Table reads: Among the 27 SEA officials who reported that stakeholders are monitoring or will monitor implementation of the ESSA, 23 identified civil rights organizations as among the groups mobilizing.

Officials who said "other" groups were mobilizing elaborated by mentioning education advocacy groups (5 states), policymakers (4), Indian tribes (2), and issue-specific groups, such as arts advocates, school counselors, or social studies teachers (2).

States received assistance from a variety of sources when developing their state plans.

All of the survey respondents reported receiving assistance from the Council of Chief State School Officers, the national organization representing state education agency leaders. Many states reported

receiving assistance from the U.S. Department of Education, federal technical assistance centers, and private education consulting firms.

Table 15. From which entities has your state sought and received technical assistance in developing the state plan?

	Number of states
Council of Chief State School Officers	45
U.S. Department of Education under the Obama Administration	31
U.S. Department of Education under the Trump Administration	28
Private education consulting firms	26
Other state education agencies	26
Federal technical assistance centers	26
Chiefs for Change	15
Institutions of higher education	9
Other	4

Table reads: SEA officials in 45 states reported that their agency sought and received technical assistance from the Council of Chief State School Officers in developing their state ESSA plan.

Title II-A Teacher and Principal Programs

Title II, Part A of ESSA provides funding to states and districts for a variety of activities to improve the quality of teaching and school leadership, such as professional development, recruitment and retention, mentoring and induction, and class-size reduction. The Trump fiscal year 2018 budget request cuts all funding for Title II-A programs, as does the U.S. House of Representatives-passed bill, while the Senate spending bill level-funds the program. The survey included a question about the impact of the potential elimination of Title II-A.

Most of the responding states would find it very challenging to carry out activities for teachers (42 states) and principals (41) if Title II-A funding were eliminated.

Without Title II-A funding, nearly all of the responding SEA officials said their state would find it very challenging to provide professional development opportunities for teachers and principals. Officials in 40 states would find it moderately (8) or very challenging (32) to implement teacher recruitment and/or retention activities without Title II dollars. A majority of responding states would find it moderately or very challenging to carry out programs supporting alternative routes to teaching programs (33), class-size reduction activities (38), and principal and teacher evaluation systems (33).

Table 16. To what extent would the elimination of Title II-A funds present a challenge in carrying out educator-related activities?

	Very challenging	Moderately challenging	Not challenging	N/A: Not a Title Il-supported activity in my state	Not sure
Provide professional development opportunities for teachers	42	2	0	0	1
Provide professional development opportunities for principals	41	3	0	0	1
Implement teacher recruitment and/or retention activities	32	8	0	1	4
Develop alternative routes to teacher certifications	27	6	5	4	3
Reduce class sizes	24	14	2	0	5
Establish or revise principal evaluation systems	20	13	2	7	3
Establish or revise teacher evaluation systems	19	14	2	7	3

Table reads: SEA officials in 42 states reported that it would be very challenging for their agency to provide professional development opportunities for teachers if funding for Title II-A programs under ESSA were eliminated.

Some states reported that they were using Title II-A funds for activities other than those listed in the survey and indicated that the loss of federal dollars for these activities would be very challenging. These other Title II activities include district-developed professional development activities, teacher induction and mentoring programs, and support to low-performing schools and districts.

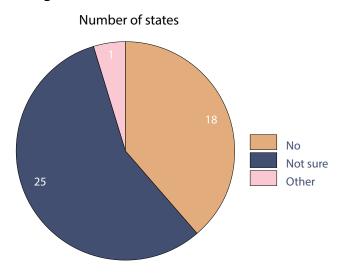
Federal Private School Vouchers

President Trump and Secretary of Education Betsy DeVos have expressed strong support for school choice. The President's 2018 budget request would use \$1 billion in federal Title I funds to support and encourage public and private school choice. As a candidate, Trump proposed a \$20 billion program to support public and private school vouchers, although no such proposal has been enacted as of this writing. Reflecting these proposals, our survey asked state officials whether their state would apply to participate in a program that allowed federal ESSA funds to be used for private school vouchers.

No state official gave a "yes" response indicating that their state would participate in a federal voucher program supported with ESSA funds.

More than half (25) of the survey respondents were unsure whether their state would apply for such a program. Officials in 18 states said their state would not apply. Officials in one state chose the "other" response.

Figure 14. Would your SEA apply to participate in a federal private school voucher program supported with ESSA funding?



Note: No participants selected the "Yes." One state skipped this question.

Figure reads: No state education agency official indicated that their agency would participate in a federal private school voucher program.

Conclusion and Recommendations

Conducted at a point when states had completed or were finalizing their ESSA plans, CEP'S survey offers an early look at both the progress states are making and the challenges they are facing as they implement a law that increases their flexibility but puts new stress on state capacity. The survey also provides baseline information about the early phases of state implementation of ESSA. Moving forward, these early findings will help track how ESSA implementation unfolds at the state level and in districts and schools.

Despite the fact that CEP's survey captures the earliest stage of ESSA implementation, the results did identify some areas where the federal or state governments could take action to support and improve ESSA implementation:

State capacity. The theory of action behind ESSA is that shifting control of accountability and school improvement to the states will bring decision-making closer to the affected schools and students, thus ensuring that reforms and improvements are calibrated to meet state and local needs. However, many state education agencies are implementing ESSA with limited resources and insufficient staff and capacity. Since the "Great Recession" of 2008, funding for education has been trending downward

in many states. A recent report from the Center on Budget and Policy Priorities³ found that in 17 states, the percentage drop in per student state funding since 2008 was more than 10%. With this bleak financial picture as the backdrop, many SEAs will struggle as they try to meet new goals and requirements. Moving forward, federal policymakers and others who track and monitor state progress need to be cognizant of what state leaders can and cannot manage, especially during politically and financially turbulent times.

Guidance and assistance from ED. The current Education Department has provided states with limited written information on implementing ESSA, and many of the states CEP surveyed reported that their direct efforts to seek policy clarifications have been met with inadequate responses from ED staff. ED should reconsider its limited approach to helping states understand some of the more complex ESSA requirements and consult with state and district leaders to learn which ESSA policy areas need more clarification.

Changing state assessments. Thirty-five states are planning to change one or more ESSA-required assessments in the next three years. Changes in assessments make it difficult to track student achievement over time, an action that is extremely useful for data-driven decision-making. States need to prioritize making new assessments comparable to previous versions so that policymakers and stakeholders can have a clear and consistent understanding of student achievement trends.

Reductions in time students spend taking tests. Twenty-five states reported that they are taking steps to cut back on the number of tests or reduce time spent on testing. With ample research showing both parental and educator concerns about the amount of time that students spend taking tests, states should undertake or continue efforts to reduce this time.

Funding for ESSA Title II programs. The Trump Administration and the U.S. House of Representatives have called for the elimination of funding for ESSA's Title II. State respondents have indicated that the loss of Title II dollars would make it challenging for states to carry out initiatives to provide professional development to teachers and principals, conduct teacher recruitment and retention efforts, and other activities. Since teacher quality is considered one of the most important factors in school improvement, Congress and the White House should support efforts to improve the quality of teaching, including providing adequate funding for Title II of ESSA.

³ Leachman, Masterson, and Figueroa, 2017.

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